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Attorneys for Defendants City of Saint Helens and  
Adam Raethke

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

ROBERT BARROR,

Case No. 3:20-cv-00731-SB

Plaintiff,

v.

CITY OF SAINT HELENS, and ADAM  
RAETHKE, in his individual capacity,

Defendants.

**DECLARATION OF JEFFREY  
HANSEN IN SUPPORT OF  
DEFENDANTS' REPLY IN SUPPORT  
OF MOTION FOR SUMMARY  
JUDGMENT**

I, Jeffrey Hansen, declare as follows:

1. I am one of the attorneys for Defendants City of St. Helens and Officer Adam Raethke ("Defendants"). I make this Declaration in support of Defendants' Motion for Summary Judgment. This Declaration is based on personal knowledge. I am competent to testify to the matters stated herein.

2. Attached as Exhibit 1 is a true and accurate copy of Defendant Adam Raethke's deposition transcript.

3. Attached as Exhibit 2 is a true and accurate copy of Trooper Christopher Cowen's deposition transcript.

4. Attached as Exhibit 3 is a true and accurate copy of the CCOM dispatch transmitted to Officer Raethke in relation to the incident giving rise to this lawsuit.

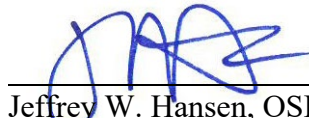
5. Attached as Exhibit 4 is the dash cam footage of the incident, taken from the vehicle driven by the Columbia County Troopers.

6. Attached as Exhibit 5 is a true and accurate copy of the 911 dispatch log for the Columbia County Sheriffs relating to the August 6, 2019 incident.

**I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES THAT THE FOREGOING IS TRUE AND ACCURATE.**

DATED this 20<sup>th</sup> day of January, 2023.

**CHOCK BARHOUM LLP**



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Jeffrey W. Hansen, OSB No. 923290

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UNITED STATES DISTRICT COURT

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ROBERT BARROR,

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Plaintiff,

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**CERTIFICATE OF SERVICE**

CITY OF SAINT HELENS, and ADAM  
RAETHKE, in his individual capacity,

Defendants.

I hereby certify that on the 20<sup>th</sup> day of January, 2023, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to all registered individuals. Additionally, I hereby certify that a true copy of the foregoing **DECLARATION OF JEFFREY HANSEN IN SUPPORT OF DEFENDANTS CITY OF SAINT HELENS AND ADAM RAETHKE'S REPLY IN SUPPORT OF SUMMARY JUDGMENT** was served as stated below on:

Page 1 **CERTIFICATE OF SERVICE**

CIS140.0007


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Steffen Legal Services, LLC  
2100 SE Lake Road, #5  
Milwaukie, OR 97222  
*Attorneys for Plaintiff*

- ☐ By hand delivery
- ☐ By first-class mail\*
- ☐ By overnight mail
- ☐ By facsimile transmission:  
Fax #:
- ☒ By e-mail:  
[info@steffenlegal.com](mailto:info@steffenlegal.com)
- ☒ By U.S. District Court CM/ECF e-filing  
service to registered parties

\*With first-class postage prepaid and deposited in Portland, Oregon.

DATED this this 20<sup>th</sup> day of January, 2023.

**CHOCK BARHOUM LLP**

  
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